

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>10-825</u>
v.	:	DATE FILED: _____
ISRAEL RAMOS,	:	VIOLATIONS:
a/k/a Carlos Casada,	:	21 U.S.C. § 846 (conspiracy to possess
HECTOR LOPEZ,	:	with intent to distribute 100 grams or
a/k/a Martin Cruz-Rodriguez,	:	more of heroin - 1 count)
NATIVIDAD CORDERO	:	21 U.S.C. § 841 (possession with intent to
	:	distribute 100 grams or more of heroin - 1
	:	count)
	:	21 U.S.C. § 841 (distribution of heroin – 2
	:	counts)
	:	18 U.S.C. § 2 (aiding & abetting)

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. In or about November 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ISRAEL RAMOS,
a/k/a Carlos Casada,
HECTOR LOPEZ,
a/k/a Martin Cruz-Rodriguez, and
NATIVIDAD CORDERO**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute 100 grams or more or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

MANNER AND MEANS

It was a part of the conspiracy that:

2. Defendant NATIVIDAD CORDERO allowed defendants ISRAEL LOPEZ and HECTOR LOPEZ to use her apartment on the first floor of 4329 Glendale Street in Philadelphia to package heroin for distribution.
3. Inside defendant NATIVIDAD CORDERO's apartment on Glendale Street in Philadelphia, defendants ISRAEL RAMOS and HECTOR LOPEZ repackaged bulk heroin into smaller blue glassine bags for distribution.
4. Defendants ISRAEL RAMOS and NATIVIDAD CORDERO delivered drugs to an address on North 15th Street in Philadelphia.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object the defendants committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about November 9, 2010, defendants ISRAEL RAMOS and NATIVIDAD CORDERO traveled from defendant CORDERO's apartment at 4329 Glendale Street in Philadelphia, Pennsylvania, to 5828 North 15th Street in Philadelphia to deliver drugs.
2. On or about November 16, 2010, defendant NATIVIDAD CORDERO traveled from her apartment at 4329 Glendale Street in Philadelphia, Pennsylvania, to 5828 North 15th Street in Philadelphia to deliver drugs.

3. On or about November 23, 2010, inside defendant NATIVIDAD CORDERO's apartment at 4329 Glendale Street in Philadelphia, defendants ISRAEL RAMOS and HECTOR APONTE LOPEZ repackaged bulk heroin into smaller quantities for distribution.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 23, 2010 in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ISRAEL RAMOS,
a/k/a Carlos Casada,
HECTOR LOPEZ,
a/k/a Martin Cruz-Rodriguez, and
NATIVIDAD CORDERO**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 100 grams or more, that is, approximately 200 grams, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 9, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ISRAEL RAMOS,
a/k/a Carlos Casada, and
NATIVIDAD CORDERO**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 16, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ISRAEL RAMOS,
a/k/a Carlos Casada, and
NATIVIDAD CORDERO**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

A TRUE BILL:

GRAND JURY FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**